

In The United States District Court for the
District of Delaware

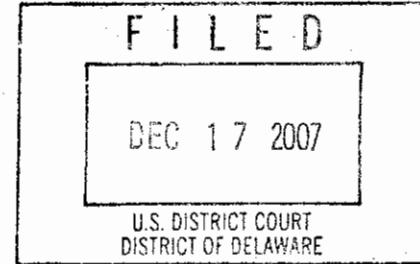
Kenneth L. Nolland,
Plaintiff

v.
Stanley Taylor, et al.,
Defendants

C.A. NO. 05-464-(SLR)

Adam J. Bramble,
Defendant/Counter-
claim Plaintiff

v.
Kenneth L. Nolland,
Plaintiff/Counter-
claim Defendant



Plaintiff's Interrogatories and Request
for Production of Documents

Pursuant to Rule 33, and 34, Fed. R. Civ. P., The Plaintiff submits the following interrogatories and Requests for documents to the defendants. You are directed to answer each of the interrogatories in writing under oath, and produce each of the requested document for inspection and copying, within 30 days of service.

Adam J. Bramble;

- 1.) State the procedures in effect during Nov 26, 2004., at the Central Violation of Probation Center, for responding to an incident involving threats by an offender OR inmate's within the facility. State all procedures, ~~if~~ If those procedures are set forth in any directive, manual, OR any other form, produce the document.
 - A.)
- 2.) State the procedures in effect during Nov 26, 2004., at the Central Violation of Probation Center, for responding to a incident involving bad behavior by an offender OR inmate's within the facility. State all procedures, ~~if~~ If those procedures are set forth in any directive, manual OR any other forms, produce the document.
 - A.)
 - A.) If any of those procedures in effect during Nov 26, 2004., that would requires written disciplinary action. regarding questions (1.) and (2.), as it pertain to the incident involving you and Plaintiff, Kenneth Holland. Produce any and all documents.
- 3.) State the names, title and duties of the staff members who was assigned to investigate the incident in which you claim, you were assaulted, during Nov 26, 2004.,
 - A.)
 - A.) Were you required to provide the investigator with an incident report concerning the assault, on Nov 26, 2004, "If so", produce the document.

A.)

4.) State the procedures in effect during Nov 26, 2004, at the Central Violation of Probation Center, "(C.V.O.P.) on what to do (or) how to handle a situation, where an inmate or offender, may need to be removed from a "pod" or a housing unit, and into a holding cell." If those procedures are set forth in any directive, manual or any other form, produce the document.

A.)

5.) State the procedures in effect during Nov 26, 2004, at the (C.V.O.P.) center, in which a Lieutenant may "at any-time", inter a "pod" or "housing unit", of inmates by him -self, If those procedures are set forth in any directive, manual, or any other forms, produce the document.

A.)

6.) If there is (no) procedure in place, as to question (5) State the current procedures in which a Lieutenant may inter OR visit a housing unit of inmates, If those procedures are set forth in any directive, manual, or any other forms, produce the document.

A.)

7.) State in writing, how you remember or what you remember about the incident, and how it unfolded, which

you and Kenneth Holland, was involved in, on Nov. 26, 2004. If there is a document, which may already contain what occurred on Nov 26, 2004, produce the document.

A.)

Kent Raymond.

7.) State the procedures in effect during June, 29, 2004., at the M.C.C.C., in which would help the (M.D.T.), board, to determine how much sanction time to give offenders who are found guilty of a program violation. If those procedures are set forth in any directive, manual, or any other forms, produce the document.

A.)

8.) If there is (no) procedure in place, as to question (7.). then state how you and the rest of the (board), came to the conclusion, to give the Plaintiff two weeks at (S.U.D.P.), then to have him wait at (C.U.D.P.), for bed space back at (M.C.C.C.).

A.)

9.) State the time your shift ended on June 29, 2004., If this is documented, produce the document.

A.)

10.) State the time that Wilbur Justice and Theresa Demarco, ended their shift on June 29, 2004., If there is documented proof of the time their shift ended, such as a time sheet, produce the document.

A.)

11.) State the procedures in effect during June 29, 2004., at the (M.C.C.C.), that takes place when an offender has to appear before the "(M.D.Y. board)", and has to work on the same day. If those procedures are set forth in any directive, manual, or any other forms, produce the document.

A.)

12.) State the procedures in effect during June 29, 2004., at the "(M.C.C.C.)", that would give the "M.D.Y., board", the authority to administratively resolve violations by sanctioning offenders at any of the "Violation of Probation Centers". If those procedures are set forth in any directive, manual, or any other forms, produce the document.

A.)

13.) If there is (no) procedures in place that give "(M.C.C.C.)", the authority, as to question (2), then State who granted the "M.D.Y. Board", the authority to sanction inmates to a

facility out-side of M.C.C.C.,

A.)

14.) State the procedures in effect during June 29, 2004., at the "(M.C.C.C.)", that would assist the M.D.T. board, in their decision on how much sanction time to a "U.O.P" center, should be given for the program violation.
If those procedures are set forth in any directive, manual, or any other form, produce the document.

A.)

15.) State if there is a procedure in place, during June 29, 2004., at the "M.C.C.C", that would keep an offender in [REDACTED] from work, if he or she has a (M.D.T. board.), hearing that same day. If those procedures are set forth in any directive, manual, or any other document, produce the document.

A.)

16.) State if there is a procedure in place, during June 29, 2004., at the "(M.C.C.C.)", that would explain how and why a offender would be held from work. If those procedures are set forth in any directive, manual, or any other document, produce the document.

A.)

Request for Production of Document

17.) Any and all logs that [REDACTED] would reflected the times of defendant Adam T. Bramble's, conducts his routine area checks at the (C.U.O.P.) center during the days of July 16, 2004, to Nov 26, 2004, on the morning hours of 5:00 A.M., to 8:00 A.M.,
A.)

18.) Copies of Plaintiff, Kenneth Holland's, case file for July 15, 2004, to Nov 26, 2004.,
A.)

19.) A copy of the complaint or police report filed against the Plaintiff Kenneth Holland, on Nov 26, 2004., by Adam T. Bramble,
A.)

Wherefore, the Plaintiff respectfully request that this Honorable court, the defendant's to answer Plaintiff's Motion for Interrogatories and Request for Production of Documents.

Date: 12-18-07

Kenneth Holland,
1181 Paddock Rd.
Smyrna, De 19977

Certificate of Service

I, Kenneth L. Holland, hereby certify that I have served a true and correct cop(ies) of the attached: Motion for Interrogatories and Request for Production of Documents upon the following parties/person (s):

to: Office of the Clerk
United States District Court
844 N. King St. Lockbox 18
Wilm, De 19801-3570

to: Catherine Damauandi
Deputy Attorney General
Department of Justice
820 N. French St ^{6TH} floor
Wilm, De 19801

to: Kenneth Holland
Delaware Correctional Center
1181 Paddock Rd.
Smyrna, De 19977

to: _____

BY PLACING SAME IN A SEALED ENVELOPE and depositing same in the United States Mail at the Delaware Correctional Center, Smyrna, DE 19977.

On this 14 day of December, 2007



INM: Kenneth Holland
SB# 1648CD UNIT 23-A-U-3
DELAWARE CORRECTIONAL CENTER
1181 PADDOCK ROAD
SMYRNA, DELAWARE 19977

Office of the Clerk
United States District Court
844 N. King St., Courtbox 18
Wilmington, DE 19801-3570

U.S.M.S.
X-RAY